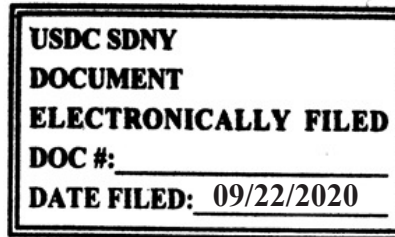


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September 21, 2020

VIA ECF

Honorable Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

SO ORDERED:

A handwritten signature in cursive script, reading "Katharine H. Parker".
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE
09/22/2020

Re: *Perdomo v. United States of America*, 19-cv-3378 (JGK) (KHP)

Dear Judge Parker,

I submit this letter jointly on behalf of both parties in response to the Court's Order dated July 29, 2020, Dkt. No. 38, which directed the parties to file a joint letter indicating whether the parties' mediation was successful, and to propose next steps for the case.

The parties held a mediation on August 20, 2020 but were unable to agree to a resolution of this dispute. Nevertheless, the parties continue to engage in settlement negotiations and therefore request a further extension of the deadlines for expert discovery and dispositive motions.

The parties respectfully request that the Court stay the pending deadlines¹ in this matter for an additional 45 days, and that the parties submit a joint status letter to the Court by November 4, 2020, to update the Court on whether the parties have successfully reached a settlement and to propose next steps for this case, including, if necessary, submitting for the Court's consideration an amended case management schedule.

We thank the Court for its consideration of this submission.

¹ The currently pending pre-trial deadlines are: (1) the exchange of disclosures generally identifying the subject matter of expert reports on which the parties will rely; (2) exchange of opening expert reports; (3) exchange of rebuttal expert reports; (4) expert dispositions; (5) dispositive motions; and (6) submission of a joint pre-trial order and motions *in limine*.

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Honorable Katharine H. Parker
September 21, 2020
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Respectfully submitted,

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